

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LISHAY LAVI, AYELET : SAMERANO, NOACH NEWMAN, : ADIN GEES, MAYA PARIZER, : NATALIE SANANDAJI, YONI : DILLER, HAGAR ALMOG, DAVID : BROMBERG, LIOR BAR OR, and : ARIEL EIN-GAL, :	:	
	:	C.A. No.: 1:24-cv-00312-RGA
Plaintiffs,	:	
	:	JURY TRIAL DEMANDED
v.	:	
	:	
UNITED NATIONS WORKS AND : RELIEF ADMINISTRATION and : UNRWA USA NATIONAL : COMMITTEE, INC. :	:	
	:	
Defendants.	:	

**STIPULATION AND [PROPOSED] ORDER GOVERNING BRIEFING FOR  
MOTION TO DISMISS**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs, Lishay Lavi, Ayelet Samerano, Noach Newman, Adin Gees, Maya Parizer, Natalie Sanandaji, Yoni Diller, Hagar Almog, David Bromberg, Lior Bar Or, and Ariel Ein-Gal (collectively, “Plaintiffs”) and Defendant UNRWA USA National Committee, Inc. (“UNRWA USA”), by and through their undersigned counsel and subject to Court approval, that the following briefing schedule shall apply to UNRWA USA’s Motion to Dismiss:

1. By October 10, 2025, UNRWA USA will file its Motion to Dismiss and Opening Brief in Support thereof;
2. Any Opposition will be due within thirty-five (35) days thereafter; and

3. The Reply Brief will be due within twenty-one (21) days thereafter.

Furthermore, the same pagination limitations applicable to UNRWA USA's Motion to Dismiss the Complaint, and entered by Order of this Court on May 16, 2024, D.I. 15, shall be applicable to UNRWA USA's Motion to Dismiss the Amended Complaint.

Dated: September 4, 2025

**HALLORAN FARKAS  
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*Attorneys for Defendant, UNRWA USA  
National Committee, Inc.*

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
The Honorable Richard Andrews  
Senior United States District Judge